REMARKS

Favorable reconsideration of this application, as presently amended, is respectfully requested.

The specification has been amended so that the identification of Figs. 2A and 2B correspond to the formal drawings.

Claims 1-44 are pending in the present application. Claims 12-43 have been withdrawn from consideration by the Examiner as being drawn to a non-elected invention. Claims 3, 8-10 and 44 were rejected under 35 USC 112 second paragraph, as being indefinite. Claim 44 was rejected under 35 USC 102(e) as being anticipated by Beggiao '892. Claims 1-11 were rejected under 35 USC 103(a) as being unpatentable over Beggiao '892 in view of Van de Ven et al. '974.

With respect to the rejection of claims 3, 8-10 and 44 under 35 USC 112 second paragraph, these claims have been amended with an eye toward correcting the informalities noted on page 2, paragraph 4 of the Office Action.

Accordingly, the noted claims are in compliance with the requirements of 35 USC 112, second paragraph.

With respect to the rejection of claim 44 under 35 USC 102(e) as being anticipated by Beggiao '892, the reference to Beggiao '892 is not believed to anticipate or make obvious the specific features required by claim 44. The reference to Beggiao '892 relates to a system for processing photographic orders in a processing lab, wherein a circular conveyance means having pallets thereon is utilized to transport elements of photographic orders to different stations which are adapted to perform different processing tasks in accordance with the complexity of the task. In one embodiment of Beggiao '892 as shown in, for example, Fig. 2, products are supplied onto pallets 510 located on a circular conveyor 500. In the embodiment of Fig. 2 of Beggiao '892, the products which are supplied through, for example, a cutter 640, do not form an order group prior to the product being both provided onto what is identified in the Office Action as a second conveyor 500. More specifically, the embodiment of Fig. 2 of Beggiao '892 does not show or suggest the concept of forming an order group on a first conveyor, and conveying the other group from the first conveyor to a second conveyor. In the embodiment of Fig. 2 of Beggiao '892, the order group is not

started or formed until the elements are placed in the pallets on conveyor 500 and thus, the embodiment of Fig. 2 of Beggiao '892 does not show or suggest the concept of forming an order group on a first conveyor and conveying the order group from the first conveyor to a second conveyor as required by the claimed invention.

In the embodiment of Fig. 4 of Beggiao '892, an additional conveyor 550 is shown. In the embodiment of Fig. 4 of Beggiao '892, additional conveyor 550 includes devices 610-640 which are adapted to insert items related to a customer order into a wallet that is supplied by either wallet feeder 610 or wallet feeder 620. After all the items belonging to one order are provided to the corresponding wallet, a completed wallet can be supplied to a customer order storage location 570 to be shipped to a photo shop or to the customer himself. If the order cannot be processed or completely processed via additional conveyor path 550, the items can be handed over to the pallets 510 on conveyer 500. Therefore, in the embodiment of Fig. 4 of Beggiao '892, a single conveyor path which is intended to complete a customer order is shown. If the customer order is not completed along this single conveyor path 550, the wallet which is assembled along conveyor path 550 can be tranferred to circular conveyor path 500. The reference to Beggiao '892 does not show or suggest the arrangement of the present invention as illustrated in, for example, Figs. 1A and 2A, wherein a high efficiency production line provides for a plurality of first conveyors which are each adapted to receive at least one photofinishing component to form an order group, and wherein the first conveyors lead to a second conveyor which is adapted to receive the order group from any of the first conveyors.

Accordingly, the reference to Beggiao '892 is not believed to anticipate or make obvious the specific features required by claim 44.

Referring to the rejection of claims 1-11 under 35 USC 103 as being unpatentable over Beggiao '892 in view of Van de Ven et al. '974, the particulars of the reference to Beggiao '892 and its applicability to the claimed invention have been discussed above with respect to Claim 44. The reference to Van de Ven et al. '974 does not correct the deficiencies of Beggiao '892 with respect to the claimed invention.

More specifically, claim 1 requires the combination of automatically dispensing at least one first type of component onto a first conveyor so as to form an order group on the first conveyor, and conveying the order group from the first conveyer to a second conveyor. Claim 1 further requires automatically dispensing at least one second type of component into the order group on the second conveyor to create an assembled product group, and shrink wrapping the assembled product group. As discussed above, the reference to Beggiao '892 is not believed to show or suggest the specific features of the conveying system of the present invention, wherein an order group is formed on a first conveyor and conveyed to a second conveyor where further components can be dispensed onto the order group. Also, as noted in the Office Action, Beggiao '892 lacks the teaching of shrink wrapping an assembled product group. The reference to Van de Ven et al. '974 was cited to show this feature.

Absent applicants' disclosure, one of ordinary skill in the art would not have combined the references to Beggiao '892 and Van de Ven et al. '974 to achieve the claimed invention. More specifically, the reference to Van de Ven et al. '974 does not provide for a shrink wrapping feature in the environment of the present invention, wherein multiple types of products that are a function of a photofinishing customer order are shrink wrapped to form an assembled product group that includes the photographic products. Van de Ven et al. '974 relates to an automatic document handling system wherein paper sheets are stacked and can be subsequently wrapped by the use of plastic shrink wrapping and/or banding. The documents that are wrapped in Van de Ven et al. '974 are all the same type of products i.e., paper sheets and are not photographic based type products which are the result of a photofinishing customer order and can be distinct type products as described in the present invention. Further, there is no teaching or suggestion in the reference to Beggiao '892 of shrink wrapping the photographic based products. Therefore, absent applicants' disclosure, one having ordinary skill in the art would not have looked at the reference to Van de Ven et al. '974 for a teaching of shrink wrapping components of a photofinishing customer order that includes photographic or digital based products as required by the claimed invention.

Accordingly, Beggiao '892 and Van de Ven et al. '974, whether considered individually or in combination, are not believed to anticipate or make obvious the specific features required by claim 1.

Claims 2-10 depend either directly or indirectly from claim 1 and set forth further unique features of the present invention which are also not believed to be shown or suggested in the applied references. For example, claim 2 further describes the at least one first type of component that makes up the order group as including at least one of an order bag, an APS package, negatives, an index card, individual prints and digital products. Claim 3 further describes features of the first type of component. Claims 4-6 describe elements of the second component as well as the first component. Claim 7 further defines the automatic dispensing step as requiring the step of dispensing each of the plurality of first type of components onto the first conveyor at different points along the longitudinal direction of the first conveyor. Claims 8-10 set forth specifics of the dispensing step and require that the components be dispensed one on top of the other. Claim 11 further requires the step of heat sealing the shrink wrapped assembled product group by conveying the assembled product group through a heat tunnel. The features of the above-noted dependent claims are not believed to be shown or suggested in the applied references. Accordingly, these claims are also believed to be allowable.

In view of the foregoing comments, it is submitted that the inventions defined by each of claims 1-11 and 44 are patentable, and a favorable reconsideration of this application is therefore requested.

Respectfully submitted,

David A. Novais

Attorney for Applicants Registration No. 33,324

DAN/ld

7

Rochester, NY 14650

Telephone: (585) 588-2727 Facsimile: (585) 477-1148